

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY,

Debtor.

PROMESA
Title III

No. 17 BK-3567-LTS

**DEBTOR'S FINAL LIST OF WITNESSES TO BE
OFFERED IN SUPPORT OF CONFIRMATION OF PLAN OF ADJUSTMENT**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Court Judge Laura Taylor Swain:

The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole Title III representative of the Puerto Rico Highways and Transportation Authority (“HTA” or the “Debtor”), pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”)², respectfully submits this Final Witness List (as defined below)³:

Debtor’s Final Witness List

1. On July 1, 2022, the Debtor filed the *Debtor’s Preliminary List of Witnesses to be Offered in Support of Confirmation of Plan of Adjustment* [ECF No. 1261] (the “Initial Witness List”), setting forth an initial list of witnesses who may testify on behalf of the Debtor in support of confirmation of the *Third Amended Title III Plan of Adjustment of the Puerto Rico Highways and Transportation Authority* [ECF No. 1240] (as it may be amended, modified, or supplement, the “HTA Plan”),⁴ and the topics about which each witness is expected to testify.

2. Also on July 1, 2022, the Debtor filed the *Debtor’s Identification of Expert Witnesses* [ECF No. 1260] (the “Expert Witness Identification”), setting forth its identification of expert witnesses who may provide opinion testimony in support of confirmation of the HTA Plan.

3. On July 12, 2022, the Debtor filed the *Debtor’s Opening Expert Disclosures* [ECF No. 1268] (the “Opening Expert Disclosures”), submitting the Debtor’s opening expert disclosures in support of confirmation of the HTA Plan.

² PROMESA is codified at 48 U.S.C. §§ 2101–2241.

³ The Oversight Board reserves all rights, including the right to call witnesses identified on other parties’ witness lists, the right to call witnesses for rebuttal if necessary, and the right to revise, amend and/or supplement for reasons including but not limited to if the Confirmation Hearing scheduled to commence on August 17, 2022, is adjourned or should the HTA Plan be modified.

⁴ Capitalized terms not defined herein shall have the meanings ascribed to them in the HTA Plan.

4. In accordance with paragraph 4 of the Court's *Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* [ECF No. 1249], the Debtor's final list of witnesses (the "Final Witness List") is as follows.

1. David A. Skeel, Jr.
2. Christina Pullo
3. Ojas Shah*
4. Jay Herriman*
5. David Brownstein*
6. Custodians of record to be identified, if necessary for authentication.

Witnesses identified with an asterisk ("") were set forth in the Expert Witness Identification as witnesses who may offer testimony pursuant to Fed. R. Civ. P. 26(a)(2)(C), and the Debtor filed a disclosure for each such witnesses in the Opening Expert Disclosures [ECF No. 1268].

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WHEREFORE the Debtor respectfully requests the Court take notice of the foregoing.

Dated: July 27, 2022
San Juan, Puerto Rico

Respectfully submitted,

/s/ Brian S. Rosen

Martin J. Bienenstock (*pro hac vice*)

Brian S. Rosen (*pro hac vice*)

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